

Message

From: Hanley, Mary [Hanley.Mary@epa.gov]
Sent: 12/12/2018 12:24:46 AM
To: Beck, Nancy [Beck.Nancy@epa.gov]; Bertrand, Charlotte [Bertrand.Charlotte@epa.gov]; Baptist, Erik [Baptist.Erik@epa.gov]
Subject: Fwd: Due Thursday, Jan 18 - New Request: ITRC DRAFT PFAS TECHNICAL AND REGULATORY GUIDANCE DOCUMENT – REVIEW REQUEST
Attachments: Copy of ITRCPFASDraftTechRegComments_EPA-CCD RAD ORD.XLSX; ATT00001.htm; Re: ITRC DRAFT PFAS TECHNICAL AND REGULATORY GUIDANCE DOCUMENT – REVIEW REQUEST; ATT00002.htm
Flag: Flag for follow up

Hi. Attached are OPPT's comments which were originally due today in case you want to review them early. EPA received an extension into January but I don't see these comments changing for this very lengthy document. We received an extension because the ITRC Project Advisor posed additional questions about how to deal with the length of the document (split it in two, etc.). So for the most part, additional comments will likely focus how to present the information. Note, I have asked OPPT to check to make sure they have adequately addressed specific areas as appropriate (e.g. Chapter 3/Firefighting foam; Chapters 13-14/Risk Comms, etc) which due to the length of the document, the Project Advisor recommends that EPA focus on.
M

Sent from my iPhone

Begin forwarded message:

From: "Hanley, Mary" <Hanley.Mary@epa.gov>
Date: December 11, 2018 at 10:17:59 AM EST
To: "Scheifele, Hans" <Scheifele.Hans@epa.gov>, "Pierce, Alison" <Pierce.Alison@epa.gov>
Cc: "Morris, Jeff" <Morris.Jeff@epa.gov>, "Henry, Tala" <Henry.Tala@epa.gov>, "Keller, Kaitlin" <keller.kaitlin@epa.gov>
Subject: Due Thursday, Jan 18 - New Request: ITRC DRAFT PFAS TECHNICAL AND REGULATORY GUIDANCE DOCUMENT – REVIEW REQUEST

Thanks Hans. Thanks again for the comments. We now have a new task and due date of 1/23 to OCIR because the Project Advisor is asking some specific questions, shown in the attached, which mostly focus on whether the document should be divided into 2 documents and how best to represent the material on the web, etc. Also, given the length of the document, the Project Advisor recommends reviewers target their focus to specific areas (e.g. Chapter 3/Firefighting foam; Chapters 13-14/Risk Comms, etc).

Please prepare comments in a word document responding to the non-technical questions in the attached. Please also consider whether the comments submitted adequately consider the specific chapters mentioned here and if needed augment OPPT's set of comments attached. Your comments are being circulated in the IO so if you decide to augment just flag whatever is new. Please send both to me by January 18th. Let me know of any questions. Thanks.
M

From: Scheifele, Hans
Sent: Monday, December 10, 2018 6:14 PM
To: Hanley, Mary <Hanley.Mary@epa.gov>; Pierce, Alison <Pierce.Alison@epa.gov>
Cc: Morris, Jeff <Morris.Jeff@epa.gov>; Henry, Tala <Henry.Tala@epa.gov>; Keller, Kaitlin

<keller.kaitlin@epa.gov>

Subject: RE: Comments Due Dec 5thFW: ITRC DRAFT PFAS TECHNICAL AND REGULATORY GUIDANCE DOCUMENT – REVIEW REQUEST

Mary,

With apologies for being late - attached are comments from RAD, CCD. CCD also coordinated with John Washington of ORD to provide his comments which are also included. Tala has reviewed and approved.

Thanks,
Hans

Hans Scheifele
Special Assistant
Office of Pollution Prevention and Toxics
1200 Pennsylvania Ave., NW
Washington, DC 20460
Voice (202) 564-3122

From: Hanley, Mary

Sent: Friday, October 26, 2018 1:37 PM

To: Pierce, Alison <Pierce.Alison@epa.gov>; Scheifele, Hans <Scheifele.Hans@epa.gov>

Cc: Morris, Jeff <Morris.Jeff@epa.gov>; Henry, Tala <Henry.Tala@epa.gov>; Keller, Kaitlin <keller.kaitlin@epa.gov>

Subject: Comments Due Dec 5thFW: ITRC DRAFT PFAS TECHNICAL AND REGULATORY GUIDANCE DOCUMENT – REVIEW REQUEST

Hi,

Attached is a request from OCIR for comments on the (lengthy) ITRC PFAS technical and regulatory guidance document. The IO would like a consolidated set of comments by Wed, Dec 5th since this is due to OCIR on Tues, Dec 11th. Please use the spreadsheet provided and send the comments to me. Please find more background and instructions below. Let me know of any questions. Thank you!

M

From: Barbery, Andrea

Sent: Friday, October 26, 2018 11:10 AM

To: Impellitteri, Christopher <Impellitteri.Christopher@epa.gov>; Thornton, Hilary <Thornton.Hilary@epa.gov>; Burchette, John <Burchette.John@epa.gov>; Ledbetter, Ray <Ledbetter.Ray@epa.gov>; Davison, Jenny <davison.jenny@epa.gov>; Matthews, Lisa <Matthews.Lisa@epa.gov>; Cooke, Maryt <Cooke.Maryt@epa.gov>; Newhart, Gary <Newhart.Gary@epa.gov>; Chattopadhyay, Sandip <chattopadhyay.sandip@epa.gov>; Willis, Kevin <Willis.Kevin@epa.gov>; Holsinger, Hannah <Holsinger.Hannah@epa.gov>; Hanley, Mary <Hanley.Mary@epa.gov>; Pierce, Alison <Pierce.Alison@epa.gov>; Barth, Edwin <Barth.Ed@epa.gov>; Baier-Anderson, Caroline <Baier-Anderson.Caroline@epa.gov>

Cc: Richardson, RobinH <Richardson.RobinH@epa.gov>; Klasen, Matthew <Klasen.Matthew@epa.gov>; Grevatt, Peter <Grevatt.Peter@epa.gov>; Gaines, Linda <Gaines.Linda@epa.gov>; Fiedler, Linda <Fiedler.Linda@epa.gov>; Holdsworth, Thomas <Holdsworth.Thomas@epa.gov>

Subject: FW: ITRC DRAFT PFAS TECHNICAL AND REGULATORY GUIDANCE DOCUMENT – REVIEW REQUEST

Greetings, PFAS Team!

You are receiving this message because ITRC has indicated that YOU are members of the PFAS Team (or because you asked me to include you on these distro's).

You probably saw that the Tech/Reg document is up for external review – I know it's a big ask (486 pp + tables!), but ITRC really does benefit from EPA's perspective on these documents. Specifically, if you can help flag regulatory issues that might otherwise be overlooked by the authors, this is especially helpful. Please, take a look at the table of contents, maybe just review one or a handful of sections that you feel closest to. Also, please feel free to share pieces with your subject-matter expert colleagues.

The zip file containing all the documents is at
<https://www.itrcweb.org/FileCabinet/GetFile?fileID=14565>.

The comment spreadsheet we're asked to use is attached. Please also see the overarching review questions posed by Lesley Hay Wilson, below.

Comments are due back to ITRC on Wed/Dec. 12th. If you can get me your comments by **Tues/Dec. 11th**, I'll compile everything into one spreadsheet for Lesley/Ginny/Bob.

Thank you for helping ensure the success of this ITRC product!

Andrea Barbery
Office of Intergovernmental Relations
U.S. Environmental Protection Agency
202-564-1397

From: Lesley Hay Wilson [mailto:lhay_wilson@sagerisk.com]
Sent: Wednesday, October 24, 2018 6:33 PM
To: Lesley Hay Wilson <lhay_wilson@sagerisk.com>
Cc: Chapman, William <randy.chapman@deq.virginia.gov>; Patricia Reyes <preyes@ecos.org>; Richard Spiese <Richard.spiese@vermont.gov>; Tom Higgins <tom.higgins@state.mn.us>; Bob Mueller <bob.mueller@dep.nj.gov>; Virginia Yingling <virginia.yingling@state.mn.us>
Subject: ITRC DRAFT PFAS TECHNICAL AND REGULATORY GUIDANCE DOCUMENT – REVIEW REQUEST

To: ITRC Federal Partners
cc: Randy Chapman, Patricia Reyes, Richard Spiese, Tom Higgins
From: Robert Mueller, NJ DEP; Virginia Yingling, MN Dept of Health
Date: October 24, 2018

REQUEST SNAPSHOT:

DRAFT REVIEW/COMMENT: Technical and Regulatory Guidance Document Per- and Polyfluoroalkyl Substances (PFAS)

REVIEW/COMMENT PERIOD: October 24 – December 12, 2018

REVIEW/COMMENT REQUEST: The PFAS Team is offering a draft technical and regulatory guidance document (see link provided below) for your review and comment. Please focus your comments on the content, thoroughness, and usefulness of the documents, not on editorial comments. The documents will be going through a complete editorial review after comments are received and addressed. Please use this review opportunity to make sure this ITRC document meets your needs and requirements. In your comment submission please include any regulatory or related barriers to the routine use of the guidance document.

DOCUMENT INTENT/GOAL: ITRC has already published seven PFAS fact sheets. The published fact sheets can be accessed at this web site <https://pfas-1.itrcweb.org>.

The technical and regulatory guidance document is tailored to the needs of state regulatory program personnel who are tasked with making informed and timely decisions regarding PFAS-impacted sites. The content is also useful to consultants and parties responsible for the release of these contaminants, as well as public and tribal stakeholders. The technical and regulatory guidance document will be published as a web-based document.

KEY ISSUES FOR CONSIDERATION DURING REVIEW:

- Is the information at level that is useful to your staff? Is it too basic? Too detailed?
- Are enough details, references and links to other resources provided so that the document will be useful to your staff?
- Are you aware of other information for PFAS that should be included?
- If you have information about case studies that could be included in the final document, please contact the team leaders.

PROGRAMS/STAFF TO TARGET FOR REVIEW:

- Staff who are involved in site investigation and cleanup at contaminated sites, such as RCRA, Superfund (State or Federal), and Voluntary Cleanup Programs.
- Staff who are involved in environmental, health, safety, and emergency response roles.
- Staff who are involved in drinking water and water treatment programs.
- Staff who interact with or provide support to AFFF users at municipalities, airports and industrial facilities.

DOWNLOAD THE GUIDANCE DOCUMENT AT:

The document and supplemental materials are provided as a zipped file through a link on the ITRC web site. The team requests that you provide your comments in the comments spreadsheet. Please also provide your comments on any of the extra tables in the comments spreadsheet. Do not mark-up the PDF of the document, or the Excel or PDF versions of the tables.

Please contact Lesley Hay Wilson if you have any difficulties with the review files.

- PFAS Technical and Regulatory Guidance Document Review Zip link:
<https://www.itrcweb.org/FileCabinet/GetFile?fileID=14565>
- The zipped file includes
 - PFAS Technical and Regulatory Guidance Document (PDF)
 - PFAS TablePhysChemPropertiesTable4-1(Excel)
 - PFAS Table 5-1 BCF, BAF, BMF – Biota (Excel)
 - PFAS Table 5-2 BCF, BAF, BMF – Plant (Excel)
 - PFAS Section 7.2 Table ecotoxicology data summary (Excel)
 - PFAS Tech Reg Treatment Tables (PDF)
 - PFAS Tech Reg Water Treatment Case Study Summary Table (Excel)
 - PFAS Table 14-2 EduMaterials (PDF)
 - Comments collector spreadsheet (Excel)

SEND COMMENTS SPREADSHEETS BY 12/12/18 TO:

- Bob Mueller at bob.mueller@dep.nj.gov, 609-984-3910
- Ginny Yingling at virginia.yingling@state.mn.us, 651-201-4930
- Lesley Hay Wilson, Program Advisor, at lhay_wilson@sagerisk.com, (512) 327-0902

Thank you in advance for your attention to this request. This is your opportunity to provide review and comment on this document before it is finalized. Please let us know how we can improve the document to make it more usable.

Regards,
Lesley Hay Wilson

Lesley Hay Wilson, Ph.D.
Sage Risk Solutions LLC
lhay_wilson@sagerisk.com
phone: 512-327-0902

Statement of Confidentiality:

The information contained in this electronic message and any attachments are intended for the exclusive use of the addressees and may contain confidential or privileged information. If you are not the intended recipient, please notify Lesley Hay Wilson immediately at (512) 327 - 0902 and destroy all copies of this message and any attachments.